

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JESSICA WANG, a United States citizen residing in Taiwan,	)	Civil Action No.
	)	
Plaintiff,	)	COMPLAINT FOR WILLFUL
	)	PATENT INFRINGEMENT
v.	)	
	)	
PRODUCTWORKS, LLC,	)	DEMAND FOR JURY TRIAL
	)	
Defendant.	)	

Plaintiff Jessica Wang, for her Complaint herein, alleges as follows:

NATURE OF ACTION

1. This action is based on the Patent Laws of the United States, 35 U.S.C. § 100 *et seq.*

THE PARTIES

2. Plaintiff Jessica Wang (“Plaintiff” or “Ms. Wang”) is a United States citizen residing in Taiwan.

4. This action arises under the Patent Act, 35 U.S.C. § 271 *et seq.* The Court has original jurisdiction of such claims pursuant to 28 U.S.C. §§ 1331 and 1338(a).

## PLAINTIFF AND HER RIGHTS

7. On December 4, 2007, the United States Patent and Trademark Office issued to Ms. Wang United States Patent No. 7,303,312 (hereinafter “the ’312 patent”), entitled “Light Shades and Lighting Systems,” a copy of which is attached hereto as Exhibit A. The ’312 patent is valid, enforceable, and subsisting.

8. On September 8, 2009, the United States Patent and Trademark Office issued to Ms. Wang United States Patent No. 7,585,091 (hereinafter “the ’091 patent”), entitled “Light Shades and Lighting Systems,” a copy of which is attached hereto as Exhibit B. The ’091 patent is valid, enforceable, and subsisting.

9. Plaintiff's '312 patent and '091 patent are hereafter referred to as the "Wang Patents."

10. Plaintiff has filed a continuation application directed to the subject matter of the Wang Patents, which is pending as U.S. Patent Application Serial No. 12/510,067.

FIRST COUNT - PATENT INFRINGEMENT

11. Plaintiff repeats and realleges each of the allegations contained in paragraphs 1 through 10 of this Complaint.

12. Upon information and belief, Defendant has been, and is continuing, infringing one or more claims of each of the Wang Patents on its own, and in concert with others, by manufacturing, importing, using, offering to sell, selling, and/or causing to be manufactured, imported, used, offered for sale or sold, lighted displays covered by one or more of the claims of the Wang Patents.

13. Defendant has had actual notice of Plaintiff's rights respecting the Wang Patents. Defendant has continued to infringe the Wang Patents after receipt of such notice.

14. Defendant's infringement has been willful.

15. Plaintiff has been, and will continue to be, damaged by such infringement in an amount to be proven at trial, and in a manner and amount that cannot be fully measured or compensated in economic terms and for which there is no adequate remedy at law. The infringing actions of Defendant have damaged, and will continue to damage, Plaintiff's business, market, reputation, and goodwill unless Defendant's acts of patent infringement complained of herein are enjoined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands judgment:

1. That Defendant, and its respective officers, agents, servants, employees, attorneys, and all other persons in active concert or participation with any of them, be enjoined and restrained during the pendency of this action and permanently thereafter from all acts that infringe one or both of the Wang Patents directly, contributorily, or by inducement, including

1 manufacturing, importing, using, offering for sale and/or selling infringing holiday lighting  
2 displays.

3 2. That Defendant be required to deliver up to the Court any and all lighting  
4 displays in its possession, custody or control that infringe either or both of the Wang Patents.

5 3. That Defendant be required to prepare and deliver to the Court a complete list of  
6 entities from whom Defendant purchased, or to whom Defendant has sold or otherwise  
7 delivered, lighting displays that infringe either or both of the Wang Patents, and to serve a copy  
8 of such list on Plaintiff's attorneys.

9 4. That Defendant be required to deliver to the Court any and all documents  
10 reflecting or relating to the manufacture, importation, purchase or sale of any lighting displays  
11 which infringe either or both of the Wang Patents.

12 5. That Defendant, within thirty days after receiving notice of entry of judgment, be  
13 required to file with the Court and serve upon Plaintiff's counsel a written report under oath  
14 setting forth in detail the manner in which Defendant has complied with Paragraphs 1  
15 through 4, immediately above.

16 6. That Defendant account for and pay over to Plaintiff damages sustained by  
17 Plaintiff, directly and indirectly, by reason of Defendant's patent infringement.

18 7. That Defendant's infringement of the Wang Patents be found willful and that  
19 treble damages, together with interest and costs, be awarded under 35 U.S.C. § 284, or as  
20 otherwise permitted by law.

21 8. That the present case be found exceptional and that attorney fees be awarded to  
22 Plaintiff under 35 U.S.C. § 285, or as otherwise permitted by law.

23 9. That Plaintiff have such other and further relief as the Court may deem  
24 equitable.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury as to all issues so triable.

DATED this 10th day of March, 2010.

Respectfully submitted,

SEED IP Law Group PLLC

/s/ Kevin S. Costanza

Kevin S. Costanza, WSBA No. 25,153

Nathaniel E. Durrance, WSBA No. 41,627

701 Fifth Avenue, Suite 5400

Seattle, Washington 98104-7092

Telephone: (206) 622-4900

Attorneys for Plaintiff

JESSICA WANG

1576462\_2.DOC